



Steven M. Neuhaus
County Executive

ORANGE COUNTY DEPARTMENT OF LAW

Application denied.

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
June 3, 2025

Municipal Law Division

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June 2, 2025

Via ECF Only

Honorable Philip M. Halpern
United States District Judge
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, NY 10601-4150

Re: Request for time to file Amended Complaint and Respond
Vargas (v) Orange County et al.
Case No.: 7:25-cv-00064 (PMH)

Dear Judge Halpern:

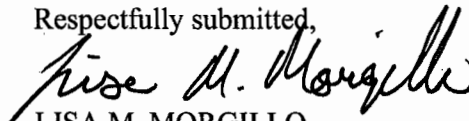
This office represents Defendant Orange County. On May 15, 2025, my office received Plaintiff's Complaint. Pursuant to the Court's Individual Rules of Practice, on May 23, 2025, we sent a letter to Plaintiff's counsel setting forth what we believed to be specific pleading deficiencies in the Complaint that would warrant dismissal. On June 2, 2025, we received a response from Plaintiff's Counsel seeking sixty days to file an Amended Complaint.

Orange County Government Center
255-275 Main Street, Goshen, NY 10924

*Service of Process by FAX is not accepted

Therefore, subject to the Court's approval we collectively and respectively request the following extensions: Plaintiff to file an Amended Complaint by August 1, 2025 and Defendant Orange County to Answer or file a pre-motion letter seeking leave to file a motion to dismiss by August 29, 2025.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lisa M. Morgillo", written in a cursive style.

LISA M. MORGILLO
Assistant County Attorney

cc: Elena Louisa Cohen, esq.
via ECF

Gideon Orion Oliver, esq.
via ECF

Remy Green, esq.
via ECF